## CADWALADER

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November 5, 2019

## VIA EMAIL

The Honorable J. Paul Oetken United States District Court Southern District of New York 40 Foley Square New York, New York 10007

United States v. Igor Fruman, 19 Cr. 725 (JPO) Re:

Dear Judge Oetken:

I am counsel for Mr. Fruman. I write to respectfully request two modifications to Mr. Fruman's bail conditions. First, Mr. Fruman respectfully requests that Mr. Steven Fruman be removed as a potential cosignor on the bond and replaced with an otherwise qualified financially responsible person. We have identified a potential cosignor and will arrange for that cosignor to be interviewed by the United States Attorney's Office.

Second, Mr. Fruman requests that the Court modify Mr. Fruman's bail travel conditions to allow Mr. Fruman to meet with counsel when necessary. Specifically, to travel to the District of Columbia and points in between for travel, with prior notice and approval of his pre-trial services' officer, when necessary to meet with counsel.

The Government does not object to the requested modifications sought herein.

Respectfully Submitted,

Todd Blanche

Jose Ste

Granted. So ordered.

November 5, 2019

Rebekah Donaleski, Esq. cc:

Nicolas Roos, Esq. Douglas Zolkind, Esq.

United States District Judge